

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

JANE DOE, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

Deval L. Patrick, Governor of the
Commonwealth of Massachusetts;
Massachusetts Department of Correction; Luis
S. Spencer, Commissioner of the Massachusetts
Department of Correction; and Lynn
Bissonnette, Superintendent of the
Massachusetts Correctional Institution at
Framingham,

Defendants.

Civil Action No. 1:14-cv-12813

Oral Argument Requested

PLAINTIFF'S MOTION FOR CLASS CERTIFICATION

Plaintiff Jane Doe, on behalf of herself and all others similarly situated, moves for class certification under Federal Rules of Civil Procedure 23(a) and 23(b)(2). The proposed class consists of:

All women who are now or will be imprisoned at MCI-Framingham based solely on a civil commitment under Massachusetts General Laws Chapter 123, Section 35.

In support of the Motion, Plaintiff relies on the accompanying Memorandum of Law and attached exhibits.

Plaintiff further moves for the appointment of the undersigned counsel as class counsel pursuant to Federal Rule of Civil Procedure 23(g).

In the alternative, if the Court finds Plaintiff has not established the requirements for certification, Plaintiff requests class discovery.

REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(d), Counsel respectfully asks the Court for a hearing on this motion.

CERTIFICATION WITH RESPECT TO LOCAL RULE 7.1(A)(2)

Because Defendants' counsel have not yet been served with the complaint, and have thus not appeared, counsel have not been able to meet and confer regarding this motion. Plaintiff's counsel will meet and confer with Defendants' counsel regarding this motion upon their appearance.

Dated: June 30, 2014

Respectfully submitted,

/s/ William F. Lee

William F. Lee (BBO# 291960)

Lisa J. Pirozzolo (BBO# 561922)

Sean K. Thompson (BBO# 624880)

WILMER CUTLER PICKERING

HALE AND DORR, LLP

60 State Street

Boston, MA 02109

Telephone: 617-526-6000

Facsimile: 617-526-5000

william.lee@wilmerhale.com

lisa.pirozzolo@wilmerhale.com

sean.thompson@wilmerhale.com

Matthew R. Segal (BBO# 654489)

Jessie J. Rossman (BBO# 670685)

AMERICAN CIVIL LIBERTIES UNION

FOUNDATION OF MASSACHUSETTS

211 Congress Street, 3rd Floor

Boston, MA 02110

Telephone: 617-482-3170

Facsimile: 617-451-0009

msegal@aclum.org

jrossman@aclum.org

Robert D. Fleischner (BBO# 171320)
Samuel R. Miller (BBO# 624969)
(pro hac vice application forthcoming)
CENTER FOR PUBLIC REPRESENTATION
22 Green Street
Northampton, MA 01060
Telephone: 413-586-6024
Facsimile: 413-586-5711
rfleischner@cpr-ma.org
smiller@cpr-ma.org

James R. Pingeon (BBO# 541852)
Bonita P. Tenneriello (BBO# 662132)
PRISONERS' LEGAL SERVICES
10 Winthrop Square, 3rd Floor
Boston, MA 02110
Telephone: 617-482-2773
Facsimile: 617-451-6383
jpingeon@plsma.org
btenneriello@plsma.org

Attorneys for Plaintiff Jane Doe

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon each party below by mail on June 30, 2014.

Deval L. Patrick
Governor of the Commonwealth of Massachusetts
Massachusetts State House
Office of the Governor
Room 105
Boston, Massachusetts 02133

Massachusetts Department of Correction
DOC Central Headquarters
50 Maple Street
Suite 3
Milford, Massachusetts 01757

Luis S. Spencer
DOC Central Headquarters
50 Maple Street
Suite 3
Milford, Massachusetts 01757

Lynn Bissonnette
MCI-Framingham
99 Loring Drive
P.O. Box 9007
Framingham, Massachusetts 01701

/s/ William F. Lee

William F. Lee